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11 RM Produce Corporation

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

12 MI PUEBLO SAN JOSE, INC.,
13 Debtor

Case No. 13-53893-ASW
Chapter 11

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE**

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17 **PLEASE TAKE NOTICE** that RM Produce Corporation (“RM Produce”), by and
18 through its attorneys, Snell & Wilmer L.L.P., hereby requests notices of all hearings, trial dates,
19 motions and notices of motions, applications for compromise, applications to abandon properties,
20 disclosure statements, plans, applications for approval to sell property of the estate or to pay
21 expenses or claims, copies of operating reports, copies of statements of deposits, returns of sale of
22 real or personal property for Court approval, motions for approval of disclosure statements and
23 plan confirmations, whether such notice, application, motion or the like is sent by the Court, the
24 debtor, or any other party in interest in this case, and requests that all notices, applications, or the
25 like be sent to the address below and that such address be added to the Court’s master mailing
26 list:
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2 Michael B. Reynolds
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10 THIS ENTRY OF APPEARANCE AND REQUEST FOR NOTICE is without prejudice
11 to RM Produce's rights, remedies and claims against other entities or any objection that may be
12 made to the jurisdiction or venue of the Court or venue of this case, and shall not be deemed or
13 construed to be a waiver of RM Produce's rights (1) to have final orders in noncore matters
14 entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so
15 triable in this case or any case, controversy, or proceeding related to this case, (3) to have the
16 District Court withdraw the reference in any matter subject to mandatory or discretionary
17 withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which RM Produce
18 is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and
19 recoupments RM Produce hereby expressly reserves.

20 Dated: July 24, 2013

SNELL & WILMER L.L.P.

21 By:

22 Michael B. Reynolds
23 Brett H. Ramsaur

24 Attorneys for Creditor
25 RM Produce Corporation